

FILED 11 AUG '23 11:01 USDC-ORP

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland DIVISION

CLINT WILLIAMS

(Enter full name of plaintiff)

Plaintiff,

v.

Civil Case No. 3:23-cv-1174 MC  
(to be assigned by Clerk's Office)

COMPLAINT FOR VIOLATION OF CIVIL  
RIGHTS (PRISONER COMPLAINT)

Multnomah County Medical Dept.

Abby ? RN Lead Nurse

[REDACTED] (JHP)

Jury Trial Demanded

☐ Yes

☒ No

Leslie ? RN & Program Manager II

(Enter full name of ALL defendant(s))

Defendant(s).

I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name:

CLINT WILLIAMS

Street Address:

11540 NE Inverness Drive

City, State & Zip Code:

Portland OR 97220

Telephone No.:

unknown

Complaint for Violation of Civil Rights (Prisoner Complaint)  
[Rev. 01/2018]

(MCIT)  
Defendant No. 1 Name: Multnomah County Medical Dept.  
Street Address: 11540 NE Inverness Dr.  
City, State & Zip Code: Portland OR 97220  
Telephone No.: unknown

(MCIT)  
Defendant No. 2 Name: Abby ? RN Lead Nurse  
Street Address: 11540 NE Inverness Dr.  
City, State & Zip Code: Portland OR 97220  
Telephone No.: unknown

(MCIT)  
Defendant No. 3 Name: Leslie ? RN & Program M.  
Street Address: 11540 NE Inverness Dr.  
City, State & Zip Code: Portland OR 97220  
Telephone No.: unknown

Defendant No. 4 Name: \_\_\_\_\_  
Street Address: \_\_\_\_\_  
City, State & Zip Code: \_\_\_\_\_  
Telephone No.: \_\_\_\_\_

## II. BASIS FOR JURISDICTION

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. You are bringing suit against (check all that apply):

- ☐ Federal officials (a *Bivens* claim)  
☒ State or local officials (a § 1983 claim)

### III. STATEMENT OF CLAIMS

My eighth amendment right is clearly established and the defendants that are named in this civil action were and are personally responsible for the violation of my rights .

On 10-4-22 I recieved an answer of my medical request from MDCDC ~~the~~ Medical department: Eye, Exams, Glasses & Dentures are not provided by the Medical Department it is out of our scope of Corrections Services. I filed a Grievance but I did not receive any Help !

On 10-6-22 I recieved a written response from Abby: We Do not ,...

... offer routine vision Glasses or Dentures but , if you have "someone" to bring them to the jail you are welcome to , otherwise you will have to wait until you are out of our custody . On 10-10-22 I filed a grievance and a Appeal but I did not get back a response from either .

On 10-12-22 I recieved a response from MCDC Medical : We recieved your medical for soft food , we have told you are getting a dental soft diet . Food is managed by an outside company named Aramark contact them about your problems .

Around the first months of 2023 , I diagnosed with having a Hernia...

... by the medical department my doctor informed me that I had an Inguinal Hernia located in my left lower groin ~~as~~ near the Scrotum area. She prescribed a hernia belt and ~~and~~ only Tylenol for the pain. On 3-5-23 I spoke with my medical provider I specifically informed her the hernia belt was causing me more pain when I wore it and the Tylenol was not effective for the pain. The medical provider stated that is all she would do, I would have to wait until I am out of their custody.



On 3-18-23 I filed another Grievance  
 my response come from Abby :  
 your issue has been addressed .

The defendants now of my serious  
 medical need of Dentures , Glasses  
 & Hernia , also constant pain caused  
 by these medical needs . The plaintiff  
 has been harmed both physically  
 and psycholo<sup>ogically</sup>~~gically~~ and the defendants  
 actions / responses in their nature ,  
 shows intentional deliberate indiffer-  
 -ence to the plaintiffs medical needs ,  
 and have inflicted him to a tremendous  
 amount of emotional distress .

The defendant actions and / or inact-  
 -ions shows a pattern of their evil  
 intentional abuse .

## IV. RELIEF

Therefore the plaintiff is suing the defendants in their individual and official capacities, and the plaintiff is asking for \$25,000 in Compensatory damages for my pain and suffering. And \$30,000 for Punitive damages for the violation of other constitutional rights by their evil intent and For Injunctive Relief.

## V.

Yes I have exhausted ALL of my Administrative Remedies.

I declare under of perjury that the forgoing is True And Correct.

Signed This 18 Day of July, 2023.

Clint Williams  
Signature